

REMARKS

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Claims 1-21, 27-28, 38, and 42 are canceled.

Claims 22-37 and 39-41 are pending.

Claims 22 is independent.

Claims 23-37 and 39-41 depend, directly or indirectly, on claim 22.

1. New Matter

The Examiner objects to the last paragraph added to claim 22, with applicants' last amendment, as introducing new matter.

Applicants have deleted this paragraph, but do not agree with the Examiner's characterization of it as introducing new matter. Applicants note that the paragraph, just before the objected-to paragraph, contains essentially the same information.

Regarding the claimed lack of use of a lens, this is clear from applicants' disclosed embodiments and the corresponding written descriptions of such embodiments.

The Examiner continues to insist that it is "impossible" for a "device to display any image if no lens is used." Applicants respectfully submit that this is clearly incorrect since, for example, the common LCD computer screen produces images without the use of a lens. Images can be created simply by controlling light (its production or transmission) on a pixel-by-pixel basis.

Furthermore, applicants have cited US Pat No. 6,055,013 (Woodgate et al.) as another example of how it was known, in the prior art, to utilize parallax barriers, on a pixel-by-pixel basis, to achieve a 3D display. In particular, applicants direct the Examiner's attention to such Figures as 6a, and the discussion of parallax barriers at such locations as col. 4, line 4 and col. 7, lines 20-22.

Applicants claim a “transmissive image display device” and the application clearly describes an example of such device as being an LCD screen (e.g., please see page 5, lines 28-29).

2. Enablement

The Examiner rejects all pending claims for failing to meet a “written description requirement” of 35 U.S.C. 112 ¶ 1.

Applicants respectfully refer the Examiner to applicants’ arguments, presented above, in conjunction with the new matter issue.

The Examiner also rejects all pending claims for failing to be enabled, as required by 35 U.S.C. 112 ¶ 1.

Applicants respectfully submit that claim 22, as currently amended, is certainly enabled. Claim 22 has been amended to specifically include the following limitation of claim 25: “the diffusing layer and the image display device substantially rigidly connected to each other.” Thus a claimed change of position, specified relative to the diffusing layer, must necessarily entail a relative change of position for the image display device.

Because claim 22 is enabled, the other claims, being dependent upon claim 22, are also enabled for at least the same reasons.

Regarding claim 37, applicants respectfully submit that zero distance, between the image display device and the filter array, can be functional for certain geometries of these components.

3. Claim Objections

Regarding the claim objection, applicants have changed “can be” to “is,” in order to further clarify the inclusion of a limitation within claim 22.

4. Obviousness

The Examiner has rejected all pending claims under 35 U.S.C. 103, by using Eichenlaub (US Pat No. 6,157,424), either on its own or in combination with one of the following: Nakayama (US Pat No. 5,831,765) or Inoguchi (US Pat No. 6,061,179).

The Examiner utilizes Figure 14 of Eichenlaub, stating: “lenticular lens (24) included is not for achieving three dimensional image viewing since the lens is there for both the 3D and 2D modes.”

Applicants respectfully direct the Examiner’s attention to the fact that the Examiner has not identified a structure, for Figure 14, that allegedly corresponds to the claimed “image display device.” Thus, in accordance with the Examiner’s own arguments, presented on page 4 of the latest Office Action, the Examiner is using Eichenlaub in a non-enabled way. Specifically, the Examiner states (emphasis added):

By varying the distance between the diffusing layer and the filter and without specifying the distance between the display device and the filter will not be able to achieve the 2D and 3D switch.

According to applicants’ best understanding of Figure 14, an image display device is placed optically after lenticular lens 14. In 3D mode, the “thin bright lines on a plane 100” (Eichenlaub, col. 12, line 11), resulting from the focii of the lenticular lens, serve a similar general function to applicants claimed “filter array” (that uses the parallax effect of transparent and opaque area segments). In 2D mode, the light rays emerging from the lenticular lens are unfocused when they pass through an image display device.

Since claim 22 is allowable over Eichenlaub, the other pending claims, being dependent upon claim 22, are allowable for at least the same reasons.

5. Summary

Applicants respectfully submit that all rejections, requirements and objections have been traversed. Therefore, applicants request a Notice of Allowance be granted.

The U.S. Patent and Trademark Office is hereby authorized to charge any fee deficiency, or credit any overpayment, to our Deposit Account No. 502584 referencing docket number “VOVH.USPA.10532951.”

Commissioner for Patents
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Respectfully submitted,

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